

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
(312) 407-0700
John Wm. Butler, Jr. (JB 4711)
John K. Lyons (JL 4951)
Ron E. Meisler (RM 3026)

- and -

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, New York, 10036
(212) 735-3000
Kayalyn A. Marafioti (KM 9632)
Thomas J. Matz (TM 5986)

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession

Delphi Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2698

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, et al.,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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JOINT STIPULATION AND AGREED ORDER ADJOURNING HEARING,
ADMINISTRATIVELY CONSOLIDATING CLAIMS, DISALLOWING AND EXPUNGING
PROOF OF CLAIM NUMBER 16467 FOR ADMINISTRATIVE PURPOSES, AND CAPPING
PROOF OF CLAIM 16220
(ROBERT BOSCH GMBH & ROBERT BOSCH LLC)

Delphi Corporation and certain of its subsidiaries and affiliates, including Delphi Automotive Systems LLC, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), Robert Bosch GmbH, and Robert Bosch LLC f/k/a Robert Bosch Corporation ("Robert Bosch LLC") respectfully submit this Joint Stipulation And Agreed Order Adjourning Hearing, Administratively Consolidating Claims, Disallowing And Expunging Proof Of Claim Number 16467 for Administrative Purposes, And Capping Proof Of Claim 16220 (Robert Bosch GmbH & Robert Bosch LLC) and agree and state as follows:

WHEREAS on October 8, 2005, the Debtors filed voluntary petitions under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended, in the United States Bankruptcy Court for the Southern District of New York.

WHEREAS on July 31, 2006, Robert Bosch LLC filed proof of claim number 13620 against Delphi Automotive Systems LLC, which asserts an unsecured non-priority claim in excess \$1, 333,984.29 ("Proof Of Claim Number 13620") stemming from alleged trade debt and warranty claims.

WHEREAS on July 31, 2006, Robert Bosch GmbH filed proof of claim number 13623 against Delphi Automotive Systems LLC, which asserted an unsecured non-priority claim in excess of \$15 million ("Proof of Claim Number 13623") stemming from the alleged infringement of certain patents.

WHEREAS on August 16, 2006, Robert Bosch GmbH filed proof of claim number 16220 against Delphi Automotive Systems LLC, which amended Proof of Claim Number 13623, and asserts an unsecured non-priority claim in excess of \$15 million ("Proof of Claim Number 16220") stemming from the alleged infringement of certain patents.

WHEREAS on December 27, 2006, Robert Bosch LLC filed proof of claim number 16467 against Delphi Automotive Systems LLC, which purports to amend Proof of Claim Number 13620, and which asserts an unsecured non-priority claim in excess of \$15 million ("Proof of Claim Number 16467," and together with Proofs of Claim Numbers 13620 and 16220, the "Bosch Claims") stemming from alleged patent infringement, warranty, and other claims.

WHEREAS on October 31, 2006, the Debtors objected to Proof of Claim Number Claim 13623 pursuant to the Debtors' Second Omnibus Objection (Procedural) Pursuant To 11 U.S.C. § 502(b) And Fed.R.Bankr.P. 3007 To Certain (I) Equity Claims, (II) Claims Duplicative Of Consolidated Trustee Or Agent Claims, And (III) Duplicated And Amended Claims (Docket No. 5451) and to Proofs of Claim Numbers 13620 and 16220 pursuant to the Debtors' (i) Third Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (a) Claims With Insufficient Documentation, (b) Claims Unsubstantiated By Debtors' Books And Records, And (c) Claims Subject To Modification And (ii) Motion To Estimate Contingent And Unliquidated Claims Pursuant To 11 U.S.C. § 502(c) (Docket No. 5452), and on April 27, 2007, the Debtors objected to Claim 16467 pursuant to the Debtors' Thirteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Protective Insurance Claims, (D) Insurance Claims Not Reflected On Debtors' Books And Records, (E) Untimely Claims And Untimely Tax Claims, And (F) Claims Subject To Modification, Tax Claims Subject To Modification, And Claims Subject To Modification And Reclamation Agreement (Docket No. 7825).

WHEREAS on December 7, 2006, the Court entered an Order Pursuant to 11 U.S.C. Section 502(b) and Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, and 9014 Establishing (I) Dates for Hearings Regarding Objections to Claims and (II) Certain Notices and Procedures Governing Objections to Claims (the "Claim Objection Procedures Order") (Docket No. 6088), which specifically stated that the procedures approved by that order did not apply to Robert Bosch GmbH.

WHEREAS on January 17, 2007, the Court entered a Stipulation And Agreed Order Resolving Debtors' Second Omnibus Objection To Claims As To Robert Bosch GmbH (Docket No. 6637), which among other things disallowed and expunged Proof Of Claim Number 13623.

WHEREAS on April 13, 2007, the Court entered a Stipulation and Agreed Order Resolving Debtors' Third Omnibus Objection to Claims as to Robert Bosch Corporation (Docket No. 7691), which, among other things, determined that the adjudication of any issues relating to Proof Of Claim Number 13620 (including any amendments) will not be subject to the Claims Procedures Order.

WHEREAS on June 27, 2007, Robert Bosch GmbH filed its Motion To Amend Proof Of Claim (Docket No. 8412) (the "Motion To Amend"), and the hearing on the Motion To Amend was set for July 20, 2007 at 10:00 a.m. (prevailing Eastern time).

WHEREAS on July 13, 2007, the Debtors' filed their Objection To Bosch GmbH's Motion To Amend Proof Of Claim, and supporting Declaration Of William Cosnowski, Jr. (Docket Nos. 8618 & 8619).

THEREFORE, the Debtors, Robert Bosch GmbH, and Robert Bosch LLC stipulate and agree as follows:

1. The hearing on the Motion to Amend is adjourned to September 28, 2007 or such other date as may be mutually agreed upon by the Debtors, Robert Bosch LLC and Robert Bosch GmbH.

2. For administrative purposes only, Proof of Claim Number 16220 (amending Proof of Claim Number 13623) of Robert Bosch GmbH and Proof of Claim Number 16467 of Robert Bosch LLC (formerly known as Robert Bosch Corporation) are consolidated into Proof of Claim Number 16220 in the name of Robert Bosch GmbH against Delphi Automotive Systems LLC, and Proof of Claim Number 16467 is accordingly expunged for administrative purposes only. Proof of Claim Number 13620 of Robert Bosch LLC shall remain in full force and effect. The purpose of this consolidation is so that the Debtor' claims register will only have one pre-petition patent infringement claim listed rather than two, while fully preserving, and in no way impairing or altering, all substantive rights, defenses, and objections of the parties with respect to the Bosch Claims, including the patent infringement claims, as set forth in the filed proofs of claim and prior stipulations and orders. For example, Bosch fully reserves its rights to prosecute the patent infringement claims against Delphi Automotive Systems LLC and the other Debtors in accordance with, and as provided in, its filed proofs of claim, including without limitation Proofs of Claim Numbers 16467 and 16220, as well as prior stipulations and orders, and the Debtors fully reserve their rights, objections, arguments and other defenses to the merits of such claims including, without limitation, that some or all of such claims are time barred or that a particular Bosch entity does not have standing to assert a particular claim. As provided in previous orders, the patent infringement claims are not subject to the Claim Objection Procedures Order. Robert Bosch GmbH and Robert Bosch LLC fully preserve and maintain their prior objections to the jurisdiction of this Court with respect to the

patent infringement claims, and the Debtors reserve their ability to contest the same.

3. Robert Bosch GmbH and Robert Bosch LLC agree that the aggregate amount of Proof of Claim Number 16220 will not exceed \$15 million. This \$15 million cap only relates to pre-petition amounts, and does not affect or impair in any way any claims by Robert Bosch GmbH or Robert Bosch LLC for post-petition infringement or post-confirmation infringement, and the ability of the Debtors and other parties-in-interest to object to the same.

So Ordered in New York, New York, this 20th day of July, 2007

/s/Robert D. Drain

UNITED STATES BANKRUPTCY JUDGE

AGREED TO AND
APPROVED FOR ENTRY:

/s/ John K. Lyons

John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606-1285
(312) 407-0700

/s/ Gordon J. Toering

Gordon J. Toering
WARNER NORCROSS & JUDD LLP
900 Fifth Third Center
111 Lyon Street NW
Grand Rapids, Michigan 49503-2487
(616) 752-2000
Attorneys for Robert Bosch GmbH and Robert
Bosch LLC

- and -

Kayalyn A. Marafioti
Thomas J. Matz
Four Times Square
New York, New York 10036
(212) 735-3000

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession